



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, WA 98101

Reply To  
Attn Of: OAQ-107

JUN 26 2003

Patrick A. Takasugi, Director  
Idaho State Department of Agriculture  
2270 Old Penitentiary Road  
P.O. Box 790  
Boise, Idaho 83701

Re: Update on EPA Perspectives, Idaho Agricultural Field Burning Program

Dear Mr. Takasugi:

The purpose of this letter is to provide an updated perspective from the Environmental Protection Agency (EPA) on Idaho's Agricultural Field Burning Program. In a letter dated January 21, 2003, I identified a number of EPA concerns and identified seven primary areas where improvements were needed, including program staffing, technical resources and ability, local smoke management coordinators and burn decision process, unauthorized burning, penalty authority, public information, and alternatives to burning. The 2003 field burning season is rapidly approaching, and it is appropriate to express EPA's understanding of Idaho's accomplishments to date in response to the concerns identified and to discuss our expectations for the upcoming season. These comments relate to the State of Idaho's field burning program in general.

Over the last several months, the State of Idaho, the Coeur d'Alene Tribe, the Nez Perce Tribe, growers, members of the general public, and EPA have continued to discuss the important issues related to field burning. Based on these discussions, I understand that substantial improvements have been made to Idaho's field burning program. However, some areas of concern still remain. EPA's understanding of progress made so far to implement improvements are outlined below:

Program Staffing: The Idaho State Department of Agriculture (ISDA) has assigned a full-time manager to the field burning program who is now coming up-to-speed on program details and will be deployed to north Idaho during the upcoming burn season.

Technical Resources and Ability: Staff from ISDA, the Idaho Department of Environmental Quality (IDEQ), and the tribes continue to expand their experience and use of the latest technical tools to better predict, track, and prevent impacts from field burning. State and tribal smoke management staff have participated in several interagency planning, coordination, and training sessions. The ClearSky agricultural smoke model has undergone technical improvements and will cover a wider geographic area this year. Also, there will be new air

quality monitoring sites in sensitive areas. Where smoke management is a viable strategy, these steps will increase the State's technical capabilities, which should improve the ability to manage field burning in a manner that protects public health and the environment.

Local Smoke Management Coordinators and Burn Decision Process: It remains our recommendation that a "regional" perspective be a key part of the burn decision process to prevent cumulative and/or long-range transport impacts. This will be an important role for the new field burning program manager to perform once he is trained and familiar with the process. We understand that training for the growers, the new field burning program manager, and the local smoke management coordinators will occur during June of 2003. It is important that all parties are clear on the process to be followed, as well as the expectations regarding protection of public health and welfare, compliance with burn decisions, and adequate and timely public notification.

Unauthorized Burning/Penalty Authority: The Idaho Legislature passed HB 391, which makes compliance with the field burning program mandatory, and provides ISDA with penalty authority for non-compliance. Additionally, HB 391 requires ISDA to investigate any complaint received regarding field burning. We believe such investigations will provide an assessment of health or welfare impacts associated with the burning as well as the relevant parties, acreage, total circumstances involved, and other pertinent factors

Public Information: With funding support from EPA, work is underway at ISDA to improve the collection, management, and communication of field burning information for the general public, the smoke managers, and the growers. Specific commitments to be in place by the start of the burn season include an enhanced ISDA website, media announcements with burn decision information, and other new communication methods. These changes are needed to improve the nature, accuracy, and timeliness of the information available to the public regarding local burn decisions.

In order to more fully understand the real health impacts, we are hopeful that the State of Idaho and the tribes will fully investigate and document any significant incidences of public health impacts that may occur as a result of agricultural field burning. This is more than just looking into the smoke management decisions that are being made, assessing air quality data, and tallying up the complaints. Rather, we believe there should be follow-up on reports of adverse health effects using trained health care professionals, such as with the Idaho Department of Health and Welfare.

Alternatives to Burning: We at EPA understand the importance of burning as a tool for growers and the value of crop production and farmland areas for water quality and other community benefits. However, we believe that open burning should be used when no viable alternatives for field management and the disposal of crop residue are available. We are therefore encouraged to see progress in the significant efforts underway to research and demonstrate alternatives to burning in the Clearwater airshed and on the Coeur d'Alene Reservation.

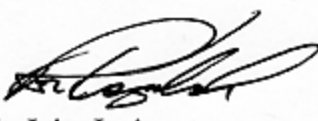
To date, EPA has provided over \$125,000 to study alternatives to burning bluegrass residue in North Idaho and we have committed another \$50,000 towards a new large-scale and long-term field study of growing bluegrass economically without using the traditional practice of burning the crop residue after harvesting the seed. While the results of this work won't be known immediately, we recognize that the efforts are noteworthy and promising. We are hopeful that similar efforts will be undertaken to find alternatives to burning on the Rathdrum Prairie, which, as you are aware, is the area of greatest public concern and has a history of adverse impacts from the burning.

Overall, I believe that significant progress has been made, and is ongoing, to improve the field burning program in Idaho. I applaud these efforts, and encourage continued emphasis in this important endeavor. However, as we all know, the true measure of success will come during the field burning season when these new improvements are being implemented.

In closing, I want to make EPA's expectations clear for the field burning season. Obviously, we expect the improvements described above will be in place and fully implemented throughout the 2003 burn season. In addition, while an objective of the smoke management program is to maintain field burning as a viable agronomic tool, the overriding goal is the protection of public health and welfare. Therefore, when and where conditions are not appropriate for burning, we expect that decisions will be made accordingly.

We appreciate the efforts being made to date, and your attention to this important public issue. EPA remains committed to working with the State of Idaho and the tribes to ensure public health and welfare are protected.

Sincerely,

  
L. John Iani  
Regional Administrator

cc: Ernest Stensgar, Chairman, Coeur d'Alene Tribe  
Anthony Johnson, Chairman, Nez Perce Tribe  
Michael Bogert, Counsel to the Governor  
Stephen Allred, Administrator, Idaho Department of Environmental Quality  
Curt Thornburg, Idaho State Department of Agriculture  
Karl B. Kurtz, Director, Idaho Department of Health and Welfare